



209620

Issue Date June 5, 1985Effective Date June 5, 1985

BEFORE THE
OHIO ENVIRONMENTAL PROTECTION AGENCY

In the Matter of: :

TRW INC. :
Aircraft Components Group :
Minerva, Ohio :

Director's Final Findings and
Orders

RESPONDENT. :

Proceeding under Ohio Revised Code :
Sections 3734.13(A) and 6111.03(H) :

RECEIVED

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ADMINISTRATIVE ORDER ON CONSENT

Office of Regional Counsel
EPA - Region V

I. JURISDICTION

This Administrative Order on Consent (Consent Order) is issued pursuant to the authority vested in the Director of the Ohio Environmental Protection Agency (OEPA) by Ohio Revised Code (ORC) Sections 3734.13(A) and 6111.03(H).

II. STATEMENT OF PURPOSE

In entering into this Consent Order, the mutual objective of OEPA and TRW Inc. is to implement a surface cleanup of environmental contamination at TRW's Minerva, Ohio facility during calendar year 1985 consistent with the requirements of the National Contingency Plan (NCP), 40 CFR Part 300.68 (a)-(j) (47 Federal Register 31180 (July 16, 1982), revised at 42 Federal Register 40658 (September 8, 1984)), as specified in the Remedial Investigation/Feasibility Study equivalent Work Plan (RI/FS equivalent), attached hereto as Attachment A and incorporated herein by reference.

III. FINDINGS OF FACT, DETERMINATIONS, AND CONCLUSIONS OF LAW

OEPA has determined that all findings of fact necessary for the issuance of this Consent Order pursuant to Section ORC Sections 3734.13(A) and 6111.03(H)

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have been made and are outlined below. Respondent, by entering into this Consent Agreement does not admit the findings set forth below. Specifically, TRW neither admits nor denies that any threatened or actual imminent and substantial endangerment exists requiring remedial action, and denies any legal liabilities associated with the Minerva site.

A. The overall site consists of approximately 135 acres located in Stark County, Ohio, near the town of Minerva, Ohio. The plant site itself is situated on a 54 acre parcel of property just east of State Route 183, approximately 1.3 miles northeast of the intersection of Route 183 and U.S. Route 30. Located on the 54 acre parcel is the single major building comprising the Minerva, Ohio, Casting Division facility of the TRW Aircraft Components Group. Additional properties known as the "South Property" and the "East Property," both adjacent to the original 54 acre parcel all make up the "Site" for purpose of this order.

B. TRW Inc. is an Ohio corporation authorized to do business in the State of Ohio. TRW's principal place of business is located at its Executive Offices, 23555 Euclid Avenue, Cleveland, Ohio 44117.

C. Respondent TRW Inc. is the owner of the Site.

D. Certain materials were used by TRW at this Site, among which were hydraulic oils containing polychlorinated biphenyls (PCBs), and solvents including 1,1,1-trichloroethane (TCA), and trichloroethene (TCE). All of those materials are "industrial wastes" as that term is defined in ORC Section 6111.01. TRW used these materials in the metal casting of aircraft components.

E. In the past, PCBs, TCA and TCE were discharged by TRW to the drainage swale and the wax ditch areas of the Site. From there the materials migrated

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or were physically moved so that now there is contamination of six specific areas at the Site: the swale, the wax ditch, the South Pond, the rubble pile, the South Property, and groundwater.

F. A release or threat of release has occurred and will continue to occur at the Site in that PCBs, TCA And TCE have been released to the environment, including discharge of TCE and TCA to waters of the State.

G. The plant Site is underlain by a layer of glacial till approximately 90 feet thick below which is a layer of limestone-shale bedrock. The glacial till layer contains a productive aquifer. The groundwater in the area moves generally in a south-southwesterly direction. Additionally, there is a surface water stream that runs to the west of the plant and drains an area known as "West Lake."

H. Across Route 183 from the plant in a southwesterly direction are a number of private residences, some of which draw domestic water from private wells.

I. Based on the information outlined above, OEPA has determined that because of an actual or threatened release of hazardous substances from the Site there may be an imminent and substantial endangerment to the public health or welfare or the environment. OEPA has also determined that action must be taken to protect public health and welfare and the environment. Such action may include, but will not necessarily be limited to, the remedial activities described more fully in the attachments to this Consent Order.

TRW Inc. (TRW) has developed, proposed and agrees to undertake only those actions required of it by the terms and conditions of this Consent Order.

IV. PARTIES BOUND

This Consent Order shall apply to and be binding upon TRW and OEPA their agents, successors, and assigns and upon all persons, contractors, and con-

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sultants acting on behalf of OEPA or TRW. TRW agrees to provide copies of this Order to all contractors performing any work called for by this Order.

V. WORK TO BE PERFORMED

OEPA and TRW agree on the scope of work and the specific remedial activities addressed by this Order, and, based on facts presently known, believe that it is consistent with the National Contingency Plan (NCP).

All response work performed pursuant to this Consent Order shall be under the direction and supervision of a qualified professional engineer or a certified geologist with expertise in hazardous waste site cleanup. Prior to the initiation of site work, TRW shall notify OEPA in writing regarding the identity of such engineer or geologist and of any contractors and/or subcontractors to be used in carrying out the terms of this Consent Order.

Moreover, all actions required to be taken pursuant to this Consent Order shall be undertaken in accordance with the requirements of all applicable local, state, and federal laws and regulations unless an exemption from such requirements is specifically provided herein. OEPA shall cooperate to expedite all required permit processing. Performance of the terms of this Consent Order is predicated upon the approval or wavier by the USEPA required by the Toxic Substances Control Act, a copy of which is incorporated by reference in this Order and attached hereto as Attachment "B."

Based on the foregoing, it is hereby AGREED TO AND ORDERED that the following work shall be performed:

A. The Respondent shall implement the tasks detailed in the Remedial Investigation and Feasibility Study equivalent Work Plan (RI/FS equivalent) which has been prepared by TRW and approved by OEPA, and is attached to and incorporated in this Consent Order (Attachment A). This work shall be conducted

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in accordance with the standards, specifications, and schedule contained in the RI/FS equivalent Work Plan.

B. Within 15 days of the effective date of this Consent Order, TRW shall commence the work called for in this Order.

C. TRW shall provide monthly written progress reports to OEPA beginning on the 15th of the month following the effective date of this Order and each month thereafter until the termination of this Order. At a minimum these progress reports shall: (1) describe the actions which have been taken toward achieving compliance with the Consent Order during the previous month, (2) include all results of sampling and tests and all other data received by TRW, and (3) include all plans and procedures completed subsequent to OEPA approval of the RI/FS equivalent Work Plan, during the past month as well as such actions, data, and plans which are scheduled for the next month.

D. Within thirty (30) days of the conclusion of all work called for by this order, TRW shall submit a final report on the project. OEPA shall use best efforts to review all reports within thirty (30) days (and in no event shall review take more than ninety (90) days) of receipt and shall notify TRW in writing of OEPA's approval or disapproval of the reports or any part thereof. In the event of any disapproval, OEPA shall specify in writing both the deficiencies and the reasons for such disapproval. Approval or disapproval by OEPA shall not be inconsistent with the NCP, CERCLA, Sections 3734.13(A) and 6111.03(H) of the Ohio Revised Code or the regulations promulgated thereunder.

E. In the event of disapproval of any report, TRW shall amend and submit to OEPA such revised reports within 30 calendar days of receipt of EPA notification of report disapproval.

Documents, including reports, approvals, and other correspondence, to be submitted pursuant to this Consent Order, shall be sent by certified mail

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to the respective Project Coordinators at the following addresses or to such other addresses as TRW or OEPA hereafter may designate in writing:

- 1) Documents to be submitted to TRW should be sent to:

Andrew Resetar, Project Coordinator
TRW Inc., T-1313
23555 Euclid Avenue
Cleveland, Ohio 44771

- 2) Documents to be submitted to the OEPA should be sent to:

Gary Gifford
Project Coordinator
Ohio EPA
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087

and

Gerald Myers
Ohio EPA
Division of Solid and Hazardous
Waste Management
P.O. Box 1049
Columbus, Ohio 43216-1049

VI. PROJECT COORDINATORS' DUTIES

The identity of each Project Coordinator is listed in paragraph V. above. Each Project Coordinator shall be responsible for overseeing the implementation of this Consent Order. To the maximum extent possible, communications between the parties and all documents, including reports, approvals, and other correspondence, concerning the activities performed pursuant to the terms and conditions of this Consent Order, shall be directed through the Project Coordinators.

OEPA and TRW each have the right to change their respective Project Coordinator. Such a change shall be accomplished by notifying the other parties in writing at least five calendar days prior to the change.

The OEPA Project Coordinator shall have the authority vested in the On-Scene-Coordinator by the National Contingency Plan; 40 C.F.R. Pat 300 et seq., 47 Federal Register 31180 July 16, 1982. The Project Coordinators shall each have the authority to direct that work stop for a period not to exceed seventy-two (72) hours whenever a Project Coordinator determines that activities at the site may create a present danger to public health or the environment.

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VII. SITE ACCESS

To the extent that the Site is presently owned by parties other than those bound by this Consent Order, TRW has obtained or will use its best efforts to obtain site access agreements from the present owners within 30 calendar days of the effective date of this Consent Order. Such agreements shall provide complete access to OEPA and/or its authorized representatives. In the event that site access agreements are not obtained within the time referenced above, TRW shall notify OEPA regarding the lack of such agreements as soon as possible after the passage of the thirty (30) days, and in no event more than fifteen (15) days after the end of the thirty (30) day time period.

VIII. SAMPLING, ACCESS, AND DATA/DOCUMENT AVAILABILITY

TRW shall make the results of all sampling and/or tests or other data generated by TRW, or on TRW's behalf, with respect to the implementation of this Consent Order, available to OEPA and shall submit these results in monthly progress reports as described in Section V of this Consent Order. OEPA will make available to TRW the results of sampling and/or tests or other data similarly generated by OEPA.

At the request of OEPA, TRW shall allow split or duplicate samples to be taken by OEPA and/or its authorized representatives, of any samples collected by TRW pursuant to the implementation of this Consent Order. TRW shall notify OEPA not less than 48 hours in advance of any sample collections activity.

OEPA or its authorized representative shall have the authority to enter and freely move about all property at the Site at all reasonable times for the purposes of, inter alia: inspecting and copying records, operating logs,

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and contracts related to the Site; reviewing the progress of TRW in carrying out the terms of this Consent Order; conducting such tests as the Project Coordinators deem necessary; and verifying the data submitted to OEPA by TRW.

All parties with access to the Site pursuant to this paragraph shall comply with all approved health and safety plans. Nothing herein shall act to limit the statutory authority of OEPA to conduct inspections and gather information.

IX. RECORD PRESERVATION

OEPA and TRW agree that each shall preserve, during the pendency of this Consent Order and for a minimum of six (6) years after its termination, all records and documents in their possession or in the possession of their divisions, employees, agents, accountants, contractors, or attorneys which relate in any way to the Site, despite any document retention policy to the contrary. After this six year period, TRW shall notify OEPA within 30 calendar days prior to the destruction of any such documents. Upon request by any party, other parties shall make available to the requesting party such records or copies of any such records.

X. DISPUTE RESOLUTION

The Project Coordinators shall, wherever possible, operate by consensus, and in the event that there is a disapproval of any report or disagreement about the conduct of the work performed under this Order, the Project Coordinators shall negotiate in good faith for 5 business days to resolve the differences.

In the event that the Project Coordinators are unable to reach consensus on the disapproval or disagreement in 5 business days, then each Project Coordinator shall reduce his position to written form within 5 business days of

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the end of the good faith negotiations referenced above. Those written positions shall be immediately exchanged by all Project Coordinators.

Following the exchange of written positions, the parties shall have an additional 5 business days to resolve their differences. In the event that disagreement remains after the 5 day period, the OEPA Project Coordinators shall specify in writing the steps or actions needed to be taken by TRW to meet the concerns of the OEPA.

TRW shall have 5 business days to consider taking the steps or actions specified by the OEPA Project Coordinator. After this 5 day period, those measures may be rendered an "action of the Director" of the OEPA (upon approval by the OEPA Director) and notice thereof shall be provided to the Respondent.

XI. RESERVATION OF RIGHTS

Nothing herein shall waive OEPA's right to seek to enforce this Consent Order under Chapter 3734, 3745 and 6111 of the Ohio Revised Code.

Nothing herein shall waive OEPA's right to take any action authorized by Ohio Revised Code Sections 3734.20 through 3734.26 or any other law.

Nothing herein shall waive TRW's right to seek to enforce any remedies or assert any defenses against the OEPA or others in connection with the Site and (or) this Consent Order.

XII. REIMBURSEMENT OF COSTS

At the end of the project, OEPA shall submit to TRW an accounting of all response and oversight costs incurred by it with respect to this Consent Order. TRW shall, within 30 calendar days of receipt of that accounting, remit a check to OEPA for the amount of those costs. OEPA presently estimates that its costs associated with this project will be approximately \$5,000. In no event, however, shall the cumulative total of oversight costs exceed \$10,000 for OEPA.

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The checks shall be made payable to Treasurer, State of Ohio; Hazardous Waste Cleanup Special Account, and shall be addressed to:

Ohio Environmental Protection Agency
Division of Solid and Hazardous Waste Management
Attn: Fiscal Officer
P.O. Box 1049
Columbus, Ohio 43216-1049

A copy of the transmittal letter should be sent to the Project Coordinator.

OEPA reserves the right to bring an action against TRW pursuant to Section 107 of CERCLA and equivalent state law for recovery of all response and oversight costs incurred by the State of Ohio related to this Consent Order and not reimbursed by TRW, as well as any other past and future costs incurred by the State of Ohio in connection with response activities conducted pursuant to CERCLA at this site.

XIII. OTHER CLAIMS

Nothing herein is intended to release any claims, causes of action or demands in law or equity against any person, firm, partnership, or corporation not a signatory to this Consent Order for any liability it may have arising out of or relating in any to the generation, storage, treatment, handling, transportation, release, or disposal of any hazardous substances, hazardous waste, pollutants, or contaminants found at, taken to, or taken from the Site.

OEPA recognizes and agrees that TRW shall have a right to contribution, indemnity and(or) any other available remedies against any person found to be a responsible person or otherwise liable for contribution, indemnity and(or) other available remedies for any amounts which have been or will be expended by TRW or paid to the OEPA under this Administrative Order or otherwise in connection with any claims asserted by the OEPA and(or) others against TRW in connection with the Site.

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XIV. INDEMNIFICATION

TRW agrees to indemnify and save and hold OEPA, its agents and employees, harmless from any and all claims or causes of action arising from or on account of acts or omissions of TRW, its agents or assigns, in carrying out the activities pursuant to this Consent Order. OEPA shall not be party to any contract involving TRW for work accomplished pursuant to this Order. Consistent with federal, state, and common laws, nothing in this Order shall render TRW liable for any act or omission of OEPA.

XV. PUBLIC COMMENT, EFFECTIVE DATE AND MODIFICATION

As soon as possible after the execution of this Order, OEPA shall make such Order available to the public for review and comment pursuant to OEPA policy.

This Consent Order may be amended by mutual agreement of OEPA and TRW. Such amendments shall be in writing and shall have as the effective date, that date on which such amendments are signed by the last party.

XVI. RELEASE AND COVENANT NOT TO SUE

Upon termination of this Consent Order pursuant to Section XVII of this Consent Order, and reimbursement to OEPA as provided in Section XII, OEPA covenants not to sue TRW for costs incurred by OEPA associated with the conduct and completion of the activities called for in this Consent Order except as otherwise reserved herein, and TRW shall be released from obligations embodied in this Consent Order with the exception of maintenance, monitoring and reporting requirements and subject to Section XI above.

XVII. TERMINATION AND SATISFACTION

The provisions of this Consent Order shall be deemed satisfied upon TRW's receipt of written approval from OEPA of the final report pursuant to paragraph V. D. above.

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IT IS SO ORDERED:

By: 

Warren W. Tyler, Director
Ohio Environmental Protection Agency

June 3, 1985

Date

TRW Inc. has consented to the issuance of this Order, and hereby waives any right it may have to appeal the issuance of this Order.

By: 

Manager, ACG Operating Services
Title

Date

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RI/FS EQUIVALENT

Pursuant to guidance from Ohio EPA and USEPA, TRW has created a "Remedial Investigation/Feasibility Study Equivalent" (RI/FS Equivalent) plan. The plan is the result of extensive sampling, lab analysis and field work, as well as desk research and analysis and engineering bench work. The results of these efforts were reported to the government agencies in a series of reports during 1983 and 1984. These reports, listed below, are, collectively, the RI/FS Equivalent.

The RI/FS Equivalent is the basis upon which the remedial action was chosen and contains within it, the description of surface remedial activities contemplated at the Minerva site.

The reports and letter that comprise the RI/FS Equivalent are:

- Report #1: CLEMENT ASSOCIATES, INC. 1983a. "Characterization, Risk Assessment and Remedial Action Plan for a PCB Spill at the TRW Site in Minerva, Ohio." Prepared for TRW Inc. June 20, 1983.
- Report #2: CLEMENT ASSOCIATES, INC. 1983b. "Enclosure to letter of December 20, 1983 from Mr. William R. Phillips (TRW) to Mr. Basil C. Constantelos (USEPA)." Prepared for TRW Inc. December 20, 1983.
- Report #3: CLEMENT ASSOCIATES, INC. 1984. "Characterization, Risk Assessment, and Remedial Action Plan for Volatile Organic Contamination at the TRW Site in Minerva, Ohio." Prepared for TRW Inc. August 27, 1984.
- Report #4: O'BRIEN AND GERE (OBG). 1983, "Preliminary Engineering Design, Minerva, Ohio Site." In Clement Associates, Inc. (1984), "Characterization, Risk Assessment, and Remedial Action Plan for Volatile Organic Contamination at the TRW Site in Minerva, Ohio", Appendix B. December 28, 1983.

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Letter and attachments, dated May 8, 1985, from O'Brien and Gere (OBG) to David Petrovski of USEPA, re: TRW Surface Remediation at Minerva, Ohio.

A summary of intended surface remedial actions, not intended to include the greater detail inherent in the actual RI/FS Equivalent, is as follows:

- o Excavation and removal of surface soil in the areas known as the swale, rubble pile, South property and wax ditch. A clay cap will replace the excavated materials.
- o Drainage and treatment of the South Pond water with subsequent solidification of the pond sediment.
- o Construction of a secure cell on the plant property for the interment of the excavated materials and solidified pond sediments.

The areas to be excavated, the depth of the excavation and the details of the design of the secure cell are contained in Report #4.

In addition to excavation and construction, the remediation plan will require the following monitoring activities during construction and for a period of 30 years thereafter:

During Remediation

- o Monthly monitoring of six selected downgradient wells on the South Property and one upgradient well. In addition, two wells immediately downgradient of the secure cell will also be monitored.
- o Monthly monitoring of surface water at two points on the stream emanating from West Lake (upgradient and downgradient of the swale) and two points in Sandy Creek (upgradient and downgradient of the confluence between Sandy Creek and the stream emanating from West Lake).
- o Monthly monitoring of sediment runoff of the confluence of the swale and the stream emanating from West Lake at the junction of Sandy Creek and the stream emanating from West Lake.

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- o Weekly monitoring of the leachate volume generated at the secure cell sump (and more frequent monitoring during storm events). The leachate will be collected for disposal off site as required.

After Site Closure

- o Weekly monitoring of the volume of leachate collected in the secure cell sump for 6 months and monthly monitoring thereafter. Leachate production, adjusted for temperature and evaporation considerations, will be graphed against time and climate conditions to determine the overall performance of the cell. Monitoring frequencies may be revised as operating experience dictates. When one truckload of leachate has collected, it will be disposed of off site.
- o Leachate quality will be monitored quarterly for 30 years following closure of the secure cell. Samples will be collected for chemical analysis from the secure cell sump. The sampling frequency may be modified as operating experience dictates.
- o Continued semiannual monitoring of three selected ground water wells on the South Property and the three wells associated with the secure cell. Sampling frequencies may be modified as operating experience dictates.
- o Continued semiannual monitoring of sediments of the two sediment monitoring stations established during surface remediation. Sampling frequencies may be modified as operating experience dictates.

Analysis to be performed on groundwater, surface water, and leachate samples collected for chemical analysis during remediation and after all closure include:

- o PCBs
- o Volatile organics
- o pH
- o Specific conductance
- o Total organic halogen (TOX)

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All monitoring and inspection records will be kept on file for 30 years following closures of the secure cell.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF.

55-P&TSB-16

MAY 31 1985

Mr. William R. Phillips
Vice President and Senior Counsel
TRW Aircraft Components
23555 Euclid Avenue
Cleveland, Ohio 44117

Dear Mr. Phillips:

We have reviewed your application dated June 20, 1983, amended on December 20, 1983, and your revised design application dated May 6, 1985, received May 21, 1985, to the United States Environmental Protection Agency (U.S. EPA), Region V for the construction and operation of a solid waste secure landfill under the Toxic Substances Control Act (TSCA) 40 CFR Section 761.75. According to your application, the facility will be used for the disposal of polychlorinated biphenyl (PCB) contaminated soils, solidified pond sediments, wax residues, and associated debris generated by the remediation of the TRW manufacturing facility at Minerva, Ohio. It has been determined that your application, including waiver requests, satisfies the criteria for PCB landfill design as given in 40 CFR Section 761.75(b).

This letter constitutes U.S. EPA authorization to conduct remedial action and on-site disposal into a solid waste secure landfill to be constructed at the TRW Plant in Minerva, Ohio, as established in your application. The 18 conditions of this approval and two waivers are given in the enclosure to this letter.

It is the responsibility of TRW to ensure that all applicable provisions of the U.S. EPA PCB regulations are followed. Any violation of the attached conditions of approval may subject TRW to enforcement action. Furthermore, this authorization only pertains to the solid waste secure landfill design, operation and maintenance, and does not relieve TRW of the responsibility to comply with all Federal, State, or local environmental regulations.

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Please contact Mr. David Petrovski or Mr. William Adams of my staff at (312) 886-6002, if you should have any questions regarding this matter.

Sincerely yours,

Alan Levin (Acting)

Valdas V. Adamkus
Regional Administrator

Enclosure

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APPROVAL CONDITIONS FOR THE SECURE LANDFILL AT THE
TRW MINERVA, OHIO MANUFACTURING FACILITY

1. This approval applies only to the submitted secure landfill design dated May 6, 1985 under TSCA 40 CFR Section 761.75(b) and to the one time disposal of the PCB contaminated soils, sediments, wax residues and associated debris generated by the remediation of the TRW manufacturing facility in Minerva, Ohio, as described in the TRW application. In this context, the "application" shall be defined as all data and materials which have been received by the U.S. EPA from TRW regarding the TRW Minerva, Ohio, manufacturing facility.
2. Only materials generated by the on-site remediation program as described in the TRW application shall be placed in the on-site secure landfill. Acceptance and placement of any other toxic or hazardous contaminated materials from other sites, either within or outside of the TRW Corporation, is strictly prohibited.
3. The following changes shall be incorporated into the design and construction of the secure landfill modifying the Contract Drawings dated May 6, 1985:
 - a. The northeast and southeast suction lysimeters as presently indicated on Contract Drawing 3A, dated May 6, 1985, shall be translated 30 feet west to the north-south center line of the secure landfill;
 - b. The two suction lysimeters along the west side of the secure landfill as presently indicated on Contract Drawing 3A, dated May 6, 1985, shall be translated 50 feet west of their present position;
 - c. The northwest suction lysimeter as presently indicated on Contract Drawing 3A, dated May 6, 1985, shall be placed 110 feet west and 90 feet north of the center of the secure landfill; and,
 - d. The southwest suction lysimeter as presently indicated on Contract Drawing 3A, dated May 6, 1985, shall be placed 110 feet west and 90 feet south of the center of the secure landfill.

The two suction lysimeters along the east side of the secure landfill as indicated on Contract Drawing 3A, dated May 6, 1985, shall remain as presently placed. The translation of the four suction lysimeters as defined above in statements 3b, 3c, and 3d, will place the four suction lysimeters on a linear traverse parallel to the base of the leachate collection system, with a separation distance between the suction lysimeters of 60 feet.

4. Eight additional monitoring wells shall be incorporated into the design and construction of the secure landfill modifying the Contract Drawings dated May 6, 1985. The eight additional monitoring wells shall be 25 feet in total depth and shall be constructed of teflon or stainless steel

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pipe. Seven of the additional monitoring wells shall be screened through a five foot saturated interval starting two feet below the mean low seasonal ground water level, while the eighth additional monitoring well, to be placed 80 feet south of the center line of the secure landfill, shall be screened through the five foot subsurface interval extending from 19 to 24 feet, i.e., to one foot above total depth. The placement of the eight additional monitoring wells shall be as follows:

- a. One well 80 feet south and 20 feet west of the northwest corner of the secure landfill;
- b. One well 80 feet south and 20 feet east of the northeast corner of the secure landfill;
- c. One well 60 feet north and 20 feet east of the southeast corner of the landfill;
- d. One well 20 feet south and 60 feet west of the southeast corner of the landfill;
- e. One well 60 feet north and 20 feet west of the southwest corner of the landfill;
- f. One well 80 feet north of the perimeter and along the north-south center line of the secure landfill;
- g. One well 20 feet south of the perimeter and along the north-south center line of the secure landfill; and,
- h. One well 80 feet south of the perimeter and along the north-south center line of the secure landfill; in addition, this well shall be screened through the 19 to 24 foot subsurface interval as stated above.

Future evaluation of landfill monitoring data may require the placement of additional ground water monitoring wells.

5. The eight additional monitoring wells described in approval condition number 4 shall be constructed in accordance with the design criteria given in 40 CFR Section 761.75(b)(6)(ii)(B).
6. Background water samples shall be taken from each of the eight additional monitoring wells described in approval condition number 4 before placement of the PCB contaminated materials into the secure landfill.
7. Water samples shall be obtained quarterly from each of the eight additional monitoring wells described in approval condition number 4 and existing monitoring wells 15, 16, and 17 shown on Contract Drawing 2A dated May 6, 1985. This water sampling program shall be initiated immediately upon the completion of landfill closure.

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8. The water from the surface water drainage channel as shown on Contract Drawing 6, dated May 6, 1985, shall be sampled quarterly, with sampling to be initiated immediately after placement of the top soil. Water may be collected in a wet well at the lower portion of the drainage channel and should be sampled after a significant precipitation event. A significant precipitation event is defined as any one-day rainfall which produces a one-inch depth of runoff over the area of the secure landfill.
9. Any leachate initially obtained from the leachate collection system shall be sampled immediately upon detection. The leachate collection system shall be sampled quarterly after closure.
10. The suction lysimeters shall be sampled immediately upon the detection of leachate and shall be sampled quarterly after closure.
11. In addition to the chemical parameters list in 40 CFR Section 761.75(b) (6)(iii) all water and leachate samples shall be analyzed for volatile organics (i.e., a volatile organic scan).
12. The sampling and testing of ground water, surface water, and leachate, as described in approval conditions 7, 8, 9, 10, and 11, shall continue for a minimum of 30 years or until the TRW secure landfill is no longer considered by the U.S. EPA as a possible hazard to health or to the environment.
13. Should the secure landfill monitoring program, as described in approval conditions 7, 8, 9, 10, 11, and 12, detect the presence of PCBs, their chemical derivatives, or volatile organics above the background levels determined in approval condition 6, the U.S. EPA shall be notified immediately, and a U.S. EPA approved remedial action program shall be initiated within six months.
14. The final cover on the secure landfill shall be completed no later than 45 days from the final placement of the PCB contaminated materials in the landfill.
15. Completion of the final cover and construction of the chain link fence shall be completed no later than one year after the date of this approval.
16. No additional modifications or variances may be made to the secure landfill design or its operation as described in the TRW application without the approval of the Regional Administrator of Region V.
17. An annual report, which should include the following information in accordance with 40 CFR Section 761.75(c) (3)(ii), shall be sent to the PCB disposal coordinator of Region V.
 - a. a summary of the analytical data from all groundwater monitoring locations and leachate collection systems specified in this approval; and,

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- b. Such additional information as the PCB Disposal Site Coordinator may require.

The first annual report shall be received by U.S. EPA no later than one year from the date of this approval.

18. U.S. EPA reserves the right for its employees or agents to inspect the TRW secure landfill at any time.

WAIVERS FOR THE TRW MINERVA, OHIO SECURE LANDFILL

Under the authority of 40 CFR Section 761.75(c)(4), the U.S. EPA grants the following two waivers of 40 CFR Section 761.75(b) requirements. These waivers are granted on the basis that they should not present an unreasonable risk of injury to health or the environment.

1. 40 CFR Section 761.75(b)(3) states that "the bottom of the landfill liner system or natural in-place soil barrier shall be at least fifty feet from the historical high water table". While the hydrologic conditions of the TRW site do not satisfy this requirement, the landfill will possess a lysimeter leak detection system and an extensive system of monitoring wells. This will allow early detection and remediation should groundwater contamination occur.
2. 40 CFR Section 761.75(b)(6)(ii)(A) requires three monitoring wells equally spaced on a line through the center of the disposal area extending from the area of highest water table elevation to the area of lowest water table elevation. Although, three of the eight additional monitoring wells described on approval condition number 4 are on a line through the center of the disposal area extending from the area of highest water table elevation to the lowest, they are not equally spaced. In consideration of the surface contamination south of the landfill site, the separation distance between the two in-line monitoring wells south of the landfill perimeter was limited to 60 feet.

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